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Third Party Plaintiffs PCJV USA, LLC, PCI  
TRADING LLC, POTATO CORNER LA  
GROUP, LLC, GK CAPITAL GROUP, LLC,  
NKM CAPITAL GROUP, LLC and GUY  
KOREN, and Defendants J & K AMERICANA,  
LLC, J&K LAKEWOOD, LLC, J&K  
OAKRIDGE, LLC, J&K VALLEY FAIR, LLC, J  
& K ONTARIO, LLC, J&K PC TRUCKS, LLC,  
HLK MILPITAS, LLC, and GK CERRITOS, LLC

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

SHAKEY'S PIZZA ASIA VENTURES,  
INC, a Philippines corporation,

Plaintiff,

vs.

PCJV USA, LLC, a Delaware limited  
liability company; PCI TRADING , LLC, a  
Delaware limited liability company; GUY  
KOREN, an individual; POTATO CORNER  
LA GROUP, LLC, a California limited  
liability company; NKM CAPITAL GROUP,  
LLC, a California limited liability company;  
J & K AMERICANA, LLC, a California  
limited liability company; J&K  
LAKEWOOD, LLC, a California limited  
liability company; J&K VALLEY FAIR,  
LLC, a California limited liability company;  
J & K ONTARIO, LLC, a California limited  
liability company; HLK MILPITAS, LLC, a  
California, limited liability company; GK  
CERRITOS, LLC, a California, limited  
liability company; J&K PC TRUCKS, LLC,  
a California limited liability company; and,  
GK CAPITAL GROUP, LLC, a California

Case No. 2:24-CV-04546-SB(AGRx)

*Hon. Stanley Blumenfeld, Jr.*

**DECLARATION OF ARASH  
BERAL RE: UNAUTHORIZED  
AND SUBSTANTIVELY  
MANIPULATED FILINGS (DKT.  
NOS. 265 AND 266)**

Complaint Filed: May 31, 2024  
Trial Date: August 18, 2025

limited liability company and DOES 1  
through 100, inclusive,

Defendants.

PCJV USA, LLC, a Delaware limited  
liability company; PCI TRADING LLC, a  
Delaware limited liability company;  
POTATO CORNER LA GROUP LLC, a  
California limited liability company; GK  
CAPITAL GROUP, LLC, a California  
limited liability company; NKM CAPITAL  
GROUP LLC, a California limited liability  
company; and GUY KOREN, an individual,

Counter-Claimants,

v.

SHAKEY'S PIZZA ASIA VENTURES,  
INC, a Philippines corporation,

Counter Defendant.

PCJV USA, LLC, a Delaware limited  
liability company; PCI TRADING LLC, a  
Delaware limited liability company;  
POTATO CORNER LA GROUP LLC, a  
California limited liability company; GK  
CAPITAL GROUP, LLC, a California  
limited liability company; NKM CAPITAL  
GROUP LLC, a California limited liability  
company; and GUY KOREN, an individual,

Third Party Plaintiffs,

v.

PC INTERNATIONAL PTE LTD., a  
Singapore business entity; SPAVI  
INTERNATIONAL USA, INC., a California  
corporation; CINCO CORPORATION, a  
Philippines corporation; and ROES 1 through  
10, inclusive,

Third Party Defendants.

**DECLARATION OF ARASH BERAL**

I, Arash Beral, declare as follows:

1. I am a partner at Blank Rome LLP, counsel of record for Defendants, Counterclaimants, and Third Party Plaintiffs. I have personal knowledge of the facts set forth in this declaration, and if called upon to testify under oath, I could and would testify competently thereto.

2. I submit this declaration to inform the Court that Plaintiff unilaterally filed Dkt. Nos. 265 and 266 without affording Defendants any opportunity to review, consent to, or approve the versions that were filed, and only after materially altering the draft I circulated at 4:04 a.m. last night. See Dkt. No. 264. Contrary to Plaintiff's representations, these filings are neither joint nor agreed submissions, and Mr. Malynn never authorized the affixation of his electronic signature. Defendants first became aware of the filed documents only after they appeared on the public docket.

3. Plaintiff's conduct is especially egregious because it substantively manipulated the documents. A comparison between my 4:04 a.m. draft (Dkt. No. 264) and Plaintiff's filed version (Dkt. No. 266) reveals that Plaintiff inserted additional argument advancing its own positions and, more troublingly, completely deleted Defendants' statements supporting the admissibility of their exhibits—beginning, for example, with Exhibit No. 1007—and replaced them with different language.

4. Plaintiff employed the same tactic with respect to the table of challenged exhibits, removing Defendants' positions wholesale and substituting different language without notice or consent.

5. Accordingly, I respectfully request that the Court strike and disregard Dkt. Nos. 265 and 266 in their entirety (and to the extent a binder was delivered or

1 is being delivered to the Court, to disregard that binder) and grant such further relief  
2 as the Court deems just and proper.

3 6. The Court has repeatedly warned that continued misconduct will trigger  
4 increasingly severe sanctions. Plaintiff's conduct this evening is among the most  
5 egregious I have encountered: filing purportedly "joint" documents without first  
6 circulating them to opposing counsel for review and consent, unilaterally  
7 supplementing those documents to advance a client's position, and simultaneously  
8 altering the opposing party's statements—thereby denying the other side any  
9 opportunity to respond—is wholly inexcusable.

10 I declare under penalty of perjury that the foregoing is true and correct.  
11 Executed August 14, 2025, within the United States, its territories, possessions, or  
12 commonwealths.

13  
14 /s/ Arash Beral  
15 Arash Beral  
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**CERTIFICATE OF SERVICE**

The undersigned certifies that on August 14, 2025, the foregoing document was electronically filed with the Clerk of the Court for the United States District Court, Central District of California, using the Court's Electronic Case Filing (ECF) system. I further certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct.  
Executed on August 14, 2025.

By: /s/AJ Cruickshank